

**THE PRITCHARD LAW FIRM, PLLC
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	
	§	
SHAH NAWAZ FARASH, DEBTOR	§	CASE NO. 22-41353-mxm13
NIGHAT SHAH FARASH, DEBTOR	§	
	§	CHAPTER 13

MOTION TO TRANSFER WITHIN THE DISTRICT

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, NATURAL FASHIONS, INC., hereinafter called Movant, and files this Motion to Transfer in the above-styled and numbered case.

I.

Jurisdiction of the Bankruptcy Court in this case is based upon 28 U.S.C. #1471, 2 and 11 U.S.C. #1301, **28 U.S.C. §1334** and **28 U.S.C. § 157(b)**.

II.

Movant, Natural Fashions, Inc. is a creditor of the Debtors and Debtors will receive notice of this action by regular U.S. mail or by ECF guidelines at **Shah Nawaz Farash and Nighat Shah Farash**, 6833 Beverly Glen Dr., Fort Worth, Texas 76132 and to the Debtors' attorney **Warren V. Norred**, Norred Law PLLC, 515 E. Border Street, Arlington, Texas 76010.

III.

In support of this Motion, Movant would show the Court: Debtors filed a previous case in the bankruptcy court, Chapter 7 Case No. 18-42120-RFN7. Further, Movant filed an Adversary proceeding, No. 18-04160-ELM, presided over by the Honorable Judge Edward L. Morris.

IV.

On July 13, 2020, the Honorable Judge Morris signed an Order in the Adversary proceeding, finding that the debt owed by Shah Nawaz Farash and Nighat Shah Farash and owing to Natural Fashions, Inc. was not discharged under 11 U.S.C. 727(a) and is a non-dischargeable debt under **11 U.S. C. § 523(a)(6)**.

V.

The Honorable Judge Morris, having presided over the matter when previously presented to the Court, is familiar with the parties and facts. The parties and the facts are similar or of the same nature, as Debtors have not made an effort to clear their debt to Movant, Natural Fashions, Inc. Transferring this matter to the Honorable Judge Morris would help to resolve this matter in an efficient and speedy manner, with respect to the Court's resources.

VI.

This is the third Bankruptcy for Debtor Shah Nawaz Farash and second for Nighat Shah Farash. The transfer of the bankruptcy proceeding to another court is warranted in the interest of justice and convenience of the parties. The Honorable Judge Morris is familiar with the substantive issues in this case and the law to be applied to this proceeding.

Based on the foregoing, the transfer of the bankruptcy proceeding from the Honorable Judge Mullins to the Honorable Judge Morris is supported by judicial economy in this matter.

WHEREFORE, PREMISES CONSIDERED, Movant prays that this Motion be set for hearing and, upon final hearing hereof, that the Bankruptcy Court transfer this

matter from the Honorable Judge Mullins to the Honorable Judge Morris's court and for such further relief as is just and right and to which the Movant may show itself justly entitled both at law and in equity.

Respectfully submitted,

THE PRITCHARD LAW FIRM

/s/ David L. Pritchard

By: DAVID L. PRITCHARD

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CERTIFICATE OF CONFERENCE

The undersigned contacted the Debtors' attorney office on July 18, 2022 and the motion is presented as opposed.

/s/ David L. Pritchard

David L. Pritchard

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Lift Stay was mailed to the following people by placing same in the United States Mail, postage prepaid, properly addressed to and/or Pursuant to the ECF guidelines:

Warren V. Norred

Norred Law PLLC

515 E. Border Street

Arlington, TX 76010

Shah Nawaz Farash

Nighat Shah Farash

6833 Beverly Glen Dr.

Fort Worth, TX 76132

Trustee

Pam Bassel

Office of The Standing Ch.13 Trustee

860 Airport Freeway

Suite 150

Hurst, TX 76054

U.S. Trustee
United States Trustee
1100 Commerce Street
Room 976
Dallas, TX 75202

Date: July 22, 2022

/s/ David L. Pritchard
David L. Pritchard